

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Eduardo Lopez

A202 076 256

YOB: 1992

Principal

United States District Court
United States Southern District of Texas
FILED

Case Number:

M-14-1498-M

Jose Manuel Carlos-Sandoval

A202 076 255

YOB: 1994

Co-Principal

United States

AUG 03 2014

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 2, 2014 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that David Camacho-De Los Santos and Jose Soto-Silva, citizens and nationals of Mexico, and Rodolfo Lopez-Castillo, citizen and national of Honduras, along with one (1) other undocumented alien, for a total of four (4), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Rio Grande City, Texas to the point of arrest in Alto Bonito, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 2nd, 2014, at approximately 1:00 AM, DPS Trooper C. Martinez, conducted a vehicle stop on a White Chrysler Concorde for Displaying Wrong License Plate and Improperly Placed/Obscured License Plate. Trooper Martinez found four people inside the vehicle. He obtained permission from the driver, later identified as Eduardo LOPEZ, to search the vehicle, and found two more people hiding in the trunk of the car. Trooper Martinez requested assistance from Border Patrol in determining alienage on the occupants of the Chrysler.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Sworn to before me and subscribed in my presence,

August 3, 2014

Date

Dorina Ramos, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Complainant

Derek Conrow

Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-14-1498-M

RE: Eduardo Lopez A202 076 256
Jose Manuel Carlos-Sandoval A202 076 255

CONTINUATION:

Border Patrol Agent Anthony J. Mungarro responded and determined Eduardo LOPEZ, and the front seat passenger, later identified as Jose Manuel CARLOS-Sandoval, were both United States Citizens. The other four occupants of the vehicle all admitted to being in the United States illegally.

PRINCIPLES' STATEMENTS:

Both principles were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Eduardo LOPEZ told agents he knew the people he was transporting were illegally in the United States. According to LOPEZ, his friend was going to pay CARLOS \$150 per person he transported. LOPEZ was going to receive gas money in return for transporting the illegal aliens. LOPEZ stated when his friend received the call that the illegal aliens were ready to be picked up, CARLOS went to pick them up. LOPEZ waited with his friend in the Walmart parking lot. When CARLOS returned, LOPEZ took over driving duties and departed the Walmart parking lot. Shortly after that they were all stopped by the police. According to LOPEZ, when the trooper stopped the vehicle, CARLOS exclaimed in Spanish "now we are all screwed!". LOPEZ identified CARLOS as the passenger and the one who made the arrangements.

2- Jose Manuel CARLOS-Sandoval stated his neighbor asked him if he would pick up some illegal aliens. CARLOS solicited the help of his friend Eduardo LOPEZ in completing the job. The neighbor offered to pay CARLOS \$150 per person he transported from Rio Grande City to McAllen. According to CARLOS, he and LOPEZ would split the money when he was paid. CARLOS received instructions to pick up the illegal aliens behind Lacks in Rio Grande City, Texas. CARLOS stated he drove around Lacks for approximately 15 minutes before the people came running out of the brush. At that point he opened the trunk and allowed two of the illegal aliens to enter the trunk. The other two entered the inside of the car. CARLOS then let LOPEZ drive, because according to CARLOS, he doesn't have a driver's license.

MATERIAL WITNESSES' STATEMENTS:

All material witnesses were read their rights. All agreed to provide statements without the presence of an attorney.

1- David Camacho-De Los Santos stated he illegally crossed the Rio Grande River. He paid \$3,900 (USD) to be smuggled into the United States. After crossing the river, the foot guide told him and the three he was travelling with, that a white vehicle would be waiting for them at Walmart. Camacho stated when they arrived, the car was not there, but did arrive shortly after. The driver, upon arriving, waved at them to board the vehicle. The trunk was open so two entered the trunk and two boarded the vehicle in the back seat. Camacho sat in the back seat behind the passenger. Camacho identified LOPEZ and CARLOS in separate photo lineups as the driver and front passenger of the vehicle respectively.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-14-1498-M

RE: Eduardo Lopez A202 076 256
Jose Manuel Carlos-Sandoval A202 076 255

CONTINUATION:

2- Jose Soto-Silva stated he illegally crossed the Rio Grande River. He was going to pay \$7,000 (USD) to be smuggled into the United States. He stated he walked for approximately 30 minutes before arriving at Walmart. There, a white vehicle arrived and the driver motioned for them to get in. Soto boarded the vehicle and sat behind the driver. Soto overheard LOPEZ telling CARLOS he saw Border Patrol. Soto stated they appeared very paranoid. According to Soto, they stopped at a convenience store to look around and then left. Everyone was told to duck down and lay as low as possible. Soto identified LOPEZ and CARLOS in separate photo lineups as the driver and front passenger of the vehicle respectively.

3- Rodolfo Lopez-Castillo stated he illegally crossed the Rio Grande River. His family was going to pay an unknown amount for him to be smuggled into the United States. After crossing the river, and walking in the brush, Lopez stated he and another person entered the trunk of a white vehicle. According to Lopez, the driver and passenger of the vehicle told him to get in the trunk. Lopez told agents the driver and passenger told him he would be able to withstand more since he was younger, therefore it was better for him to be in the trunk. Lopez stated it was extremely hot inside the trunk. Lopez stated he could not identify the driver or the passenger of the vehicle.